

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Daniel L. Simon,	)	
	)	
Plaintiff,	)	CIVIL ACTION NO.
	)	04-10716 RWZ
vs.	)	
	)	
Choice Hotels International, Inc.,	)	
New England Resort Management,	)	
LLC d/b/a Clarion Nantasket	)	
Beach Hotel,	)	
Ferdinand J. Kiley,	)	
	)	
Defendants.	)	

JOINT MOTION FOR A PROTECTIVE ORDER GOVERNING  
THE CONFIDENTIALITY OF INFORMATION PRODUCED IN THIS LITIGATION

Now come the Parties, by their attorneys, and respectfully request that the Court enter a Protective Order Governing the Confidentiality of Information Produced in this Litigation. A proposed Order is attached hereto as **Exhibit 1**.

As good cause for the allowance of the within motion, the Parties respectfully submit that certain information and documents relevant to the within action may contain or reveal highly confidential information, including medical, tax, employee personnel and/or non-public business information which either or both parties maintain is highly confidential in nature. The attached Stipulation and Order would act to permit discovery to proceed while preserving all claims of confidentiality and permit the orderly presentation of materials claimed to be confidential by either or both parties for potential impoundment under Local Rule 7.2.

The attached order would act to preserve all Parties' confidential information and would

otherwise further a prompt and efficient administration of justice in this action.

WHEREFORE, the Parties respectfully request that the within motion be ALLOWED.

Respectfully Submitted,

Daniel L. Simon  
By his attorney,

Choice Hotels International, Inc., et als  
By their attorney,

/s/ Paul F. Wood  
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